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Attorneys for Defendant,

MIDWEST FAMILY MUTUAL INSURANCE COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ARIZONA CIVIL CONSTRUCTORS, INC., a
Nevada corporation,

Plaintiff,

vs.

COLONY INSURANCE COMPANY; HDI
GLOBAL SPECIALTY SE, fka INTERNATIONAL
INSURANCE COMPANY OF HANNOVER SE;
MIDWEST FAMILY MUTUAL INSURANCE
COMPANY; DOES I-X, inclusive; and ROE
CORPORATIONS I-X, inclusive,

Defendants.

CASE NO. 2:20-cv-00010-JAD-DJA

**STIPULATION AND ORDER TO
EXTEND MIDWEST FAMILY
MUTUAL INSURANCE
COMPANY'S DEADLINE TO
FILE RESPONSE TO FIRST
AMENDED COMPLAINT [ECF
NO. 39]**

[SECOND REQUEST]

Pursuant to Local Rules 6-1 and 7-1, Defendant MIDWEST FAMILY MUTUAL INSURANCE COMPANY ("Midwest") and Plaintiff ARIZONA CIVIL CONSTRUCTORS, INC. ("ACC") (collectively, the "Parties"), by and through their respective attorneys of record, stipulate as stated below.

STIPULATION

1. On August 25, 2020, the Court issued an order granting Midwest's Motion to

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1 Dismiss ACC's First Amended Complaint ("Order"). *See* ECF No. 36.

2 2. In its Order, the Court permitted ACC leave to amend its Complaint no later than
3 September 4, 2020. *Id.*, p. 16.

4 3. ACC filed a First Amended Complaint [ECF No. 39] on September 4, 2020.

5 4. Midwest's response deadline is September 18, 2020.

6 5. On September 18, 2020, Midwest and ACC submitted a Joint Stipulation and
7 Order to Extend Midwest's Deadline to Respond to Plaintiff's First Amended Complaint. *See*
8 ECF No. 45. Midwest requested additional time to file its response up to and including
9 September 25, 2020.

10 6. The joint stipulation was denied by this Court for lack of information necessary
11 for the Court to determine whether good cause exists for the requested extension. *See* ECF No.
12 46.

13 7. Midwest and ACC hereby submit this second request, which provides further
14 details with respect to the basis for Midwest's sought extension for more time.

15 8. Midwest requests a seven (7) day extension, up to and including September 25,
16 2020, to file its response to ACC's First Amended Complaint.

17 9. Midwest requires additional time to assess the 747 pages of documents attached to
18 Plaintiff's First Amended Complaint, and to confer with counsel, in order to determine whether
19 to file a dispositive motion or a responsive pleading.

20 10. ACC does not oppose Midwest's requested extension.

21 11. Accordingly, Midwest will file its response to ACC's Complaint on September
22 25, 2020.

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12. This stipulation is not made for purposes of delay.

DATED this 21st day of September 2020.

DATED this 21st day of September 2020.

**GORDON REES SCULLY
MANSUKHANI, LLP**

FENNEMORE CRAIG, P.C.

/s/ Dione C. Wrenn

/s/ Chelsie A. Adams

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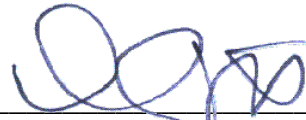
Attorneys for Plaintiff

Midwest Family Mutual Insurance

Arizona Civil Constructors, Inc.

Company

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: September 21, 2020

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